



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TM:AES
F. #2013R01609

271 Cadman Plaza East
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By Hand Delivery and ECF

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Re: United States v. Paul Rivera, et al.
Criminal Docket No. 13-149 (S-2) (KAM)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter additional discovery in the above-referenced matter. This letter is intended to supplement the government's discovery letters dated April 2, 2013, May 17, 2013, August 20, 2013 and October 2, 2013. Please consider this letter to be the government's renewed request for reciprocal discovery.

On the enclosed CD marked TF MAFIA DVD-1, please find copies of the following:

Item	Bates Number/Identifier
Robert Barber Autopsy Report	TF MAFIA 2512-2529
Robert Barber Autopsy Photographs	TF MAFIA 2530-2547
Brookdale Hospital Medical Records pertaining to Robert Barber	TF MAFIA 2548-2683
FDNY Sprint Report & FDNY Run Reports	TF MAFIA 2684-2691
Photograph of Robert Barber	TF MAFIA 2692
NYPD Firearms Analysis Section Report	TF MAFIA 2693
Photographs of the TF Mafia Tattoo Shop and Vicinity	TF MAFIA 2694-2701
Backpage.com Business Record	TF MAFIA 2702-2704
AllCar Rent-a-Car Records	TF MAFIA 2705-2738
PlatePass Records	TF MAFIA 2739-2767
AT&T Subscriber Record for Telephone Number (917) 474-9881	TF MAFIA 2768-2770
Cablevision Subscriber Record	TF MAFIA 2771-2773
Invoice from GTC Media	TF MAFIA 2774
Photographs from the TF Mafia Tattoo Shop, taken on or about August 22, 2012	TF MAFIA 2775-2803
TF Mafia Documents (miscellaneous), which appear to contain statements of the defendants	TF MAFIA 2804-2852
TF Mafia DMV Records	TF MAFIA 2853-2860
BOP Records – Inmate Quarters History	TF MAFIA 2861-2864
FBI Handwriting Analysis Report	TF MAFIA 2865-2869

Video Footage from 361 Sutter Avenue (August 22, 2011) – two .exe files	Filenames “11-8-22-21-09-00-23.exe” & “11-08-22-21-00-00-24.exe”
Web site content from http://www.flickr.com , http://www.tfmafia.com and http://www.tfnyc.com	File folders “www.flickr.com,” “www.tfmafia.com” and “www.tfnyc.com”
Audio file containing statements of defendant Rivera, made on or about June 4, 1996	Filename “917-971-8233 Rivera Call-6-4-96.wav”
Audio file containing statements of defendant Garrett, made on or about June 1, 1996	Filename “917-971-8233 Garrett Call-6-1-96.wav”

In addition to the foregoing, the FBI is in possession of (a) one Colt semi-automatic .25 caliber pistol with a silver and black handle, bearing serial number 254498; (b) one silver slide for a .380 caliber semi-automatic pistol, bearing the name Jennings Firearms; (c) one .380 caliber semi-automatic ammunition round; and (d) one gray magazine for a .380 automatic pistol containing four (4) .380 rounds, all of which were recovered on or about August 22, 2012, from within the TF Mafia tattoo shop located at 361 Sutter Avenue in Brooklyn, New York. Please contact us if you would like to arrange a time to inspect these items, or any of the original discovery.

The government will comply with Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and 705 and notify you in a timely fashion of any expert that the government intends to call at trial and provide you with a summary of the expert’s opinion. In addition to the previously identified potential experts, the government anticipates calling an expert in forensic document analysis and handwriting comparison to testify at trial consistently with the enclosed FBI Handwriting Analysis Report (TF MAFIA 2865-2869). Specifically, the examiner is expected to testify that defendant Rivera wrote the majority of the handwritten text contained within document TF MAFIA 2478, which was provided in the government’s discovery production of October 2, 2013.

If you have any questions about these materials, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Taryn Merkl
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Alixandra E. Smith
Assistant U.S. Attorneys
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Enclosures (TF MAFIA DVD-1)

cc: Clerk of the Court (KAM) (by ECF) (without enclosures)